

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ALAN RACKEMANN, individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

LISNR, INC., a Delaware Corporation,  
YINZCAM, INC., a Pennsylvania Corporation,  
and INDIANAPOLIS COLTS, INC., an  
Indiana Corporation,

*Defendants.*

Case No. 2:16-cv-01573-AJS

**NOTICE OF VOLUNTARY  
DISMISSAL WITHOUT PREJUDICE**

**Filed Electronically**

**NOTICE OF VOLUNTARY DISMISSAL**

**PLEASE TAKE NOTICE** that Plaintiff Alan Rackemann (“Plaintiff”) hereby voluntarily dismisses this action pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), without prejudice as to his individual claims and without prejudice as to the claims of the putative Class members.

Federal Rule of Civil Procedure 41(a)(1) provides, in relevant part, that “the plaintiff may dismiss an action without a court order by filing: (i) a notice of dismissal before the opposing party serves either an answer or a motion for summary judgment[.]” Fed. R. Civ. P. 41(a)(1)(A)(i). Defendants have neither answered Plaintiff’s complaint nor moved for summary judgment. Accordingly, this matter may be dismissed without prejudice and without an Order of the Court.

Respectfully submitted,

**ALAN RACKEMANN**, individually and on behalf  
of all others similarly situated,

Dated: November 18, 2016

By: /s/ David S. Senoff  
One of Plaintiff's Attorneys

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*\*Intention to seek pro hac admission mooted by  
notice of voluntary dismissal*

*Counsel for Plaintiff and the Putative Classes*

**CERTIFICATE OF SERVICE**

I, David S. Senoff, hereby certify that I served the foregoing Notice of Voluntary Dismissal on November 18, 2016 on the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ DAVID S. SENOFF

David S. Senoff, Esquire